

REMARKS

Claims 1-34 are currently pending in the application, of which claims 1 and 18 are independent claims.

In view of the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Rejections Under 35 U.S.C. § 102

Claims 1-34 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U. S. Patent No. 6,876,001 issued to Koo, *et al.* ("Koo"). Applicants respectfully traverse this rejection for at least the following reasons.

Under 35 U.S.C. § 102(e)(2), an applicant "shall be entitled to a patent unless the invention was described in a patent granted on an application for patent by another filed in the United States before the invention by the applicant for patent." Therefore, for a rejection under this statute to be valid, the filing date of the cited patent must pre-date the date of invention for the application's invention.

Applicants respectfully submit that the present rejection cannot be sustained because the reference cited by the examiner, Koo, is not a valid reference for the purpose of a rejection under 35 U.S.C. § 102(e). The present application claims priority to Korean Patent Application 2003-15855 filed on March 13, 2003 with the Korean Intellectual Property Office. Therefore, the present application has a date of invention for the purpose of 35 U.S.C. § 102(e) no later than March 13, 2003. However, the cited reference Koo was filed with the United States Patent and Trademark Office on November 19, 2003. Accordingly, because Koo's filing date does not pre-date the foreign priority date of the present application, Koo cannot be relied upon in a rejection of the present application's claims. To perfect priority in accordance with 37 C.F.R. § 1.55(a)(4)(i)(B), a certified English translation of the foreign priority document is attached herein.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejection of claims 1-34.

Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1 and 18, and all the claims that depend therefrom are allowable.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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